



EPA Region 5 Records Ctr.



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STATE OF ILLINOIS

DATE: February 24, 1981

TO: Permit Section - Sallie Smith

FROM: Brad Benning

SUBJECT: Will County Joliet/Process Alliance
(PRE-DE Inspection)

On February 24, 1981, I conducted a Pre-DE inspection of Process Alliance's Treatment facility, which currently is operating under Experimental Permit 1981-1-EX-DE.

The facility was granted the EX-DE permit on January 9, 1981, and has until March 10, 1981 to develop the site according to the special conditions set forth in the EX-DE permit. The following conditions were either observable at the facility or discussed with Mr. Guidry the Plant Manager:

Special Condition 5 - Mr. Guidry stated that 30,000 gals per day from NPC is an average amount, and they are capable of handling 60,000 gals, therefore they request the maximum limitation be raised.

Special Condition 6, 7 - The waste caustic is being manifested under expired authorization No. 790087.

The Filter-cake is being manifested to Lockport/Lockport Trucking under Auth. 801485. Mr. Guidry stated that Special Waste Applications have been submitted for the spent pickle liquor to be shipped in and for the waste oil to be transported to a reclaimer.

Special Comment a - A berm has been erected from the northeast end of the Process building to the Seawall at the northeast corner of the property. The berm is approx. 1 1/2' at the ends and has a maximum height of 3' in the middle where the sluice gate is located, to allow precipitation runoff. The berm has not been covered yet with limestone, due to the muddy conditions. Mr. Guidry believes that any spillage should run to the northeast corner, where it will be retained on PAP property. It is uncertain whether the southeast side of facility should be bermed, as the Corp. of Engineers has complained of material running onto their property. Mr. Guidry stated PAP does not own the land directly adjacent to the Corp., and that a berm there could possibly block the drainage pattern and cause flooding on the Corp. property.

The virgin acid tank does have an approximately 2' berm around it.

Special Comment n, o, r - Mr. Guidry stated that all the storage and process tanks are closed systems, so that the odor problem should be substantially reduced. He showed me the piping system to prevent vapor release, and all of the tanks do have pressure safety valves to release any excess vapor pressure. The facility was not operating during the inspection, so no odor problems were noticeable.

Mr. Guidry stated tht all physical modification is nearly complete except for checking fittings and adjusting gauges on the tanks. The site appears fairly clean as employees were cleaning the facility during the inspection. I asked Mr. Guidry if PAP had notified under RCRA, and he believes they have notified, although he could not show me their I.D. number. The waste oil they generate would be considered hazardous due to the Cd, Cr, Pb levels.

I also observed a drain in the Process building, Mr. Guidry stated this is to collect liquid leaching from the filter cake and also water from the pumps. This material is piped back to the process tanks.

I see no other areas of special review by the Permit Section, and recommend that you either grant or deny their DE Permit based on the remaining information they submitted in their letter to the Agency on February 3, 1981.

Section 1002

BB/prg

cc: Division File
Northern Region